

# EXHIBIT 3

# **Preparation and efforts to serve subpoenas; Motion to Compel Production of Witnesses for Show Cause Hearing (Doc. No. 416)\***

\*Where only a portion of the entry relates to the specified filing or task and the hours spent on that task are identified, those portions are underlined for the Court's convenience

Date	Narrative	Attorney	Hours Requested	Fees Requested	SWA Proposed Hours	SWA Proposed Reduction
4/28/2023	Analyze subpoena issues and plans to serve subpoenas to witnesses for show cause hearing (.1); researching cases re the standard for reviewing purportedly privileged documents in camera (.8); researching crime fraud exception cases related to court order violations (.4); drafting motion and brief to compel production of documents for which privilege is asserted (2.9); reviewing documents and filings related to sanctions motion (1.2); <u>reviewing subpoena rules (.7)</u> ; reviewing deadlines for filing Carter cross appeal (.6); reviewing Southwest show cause document production and analyzing SWA privilege log (2.0); outlining and organizing arguments and objections to privilege log and privilege claims for motion to compel brief (1.7)	Gilliam	0.8	\$280.00	0.2	\$210.00
5/1/2023	Preparing and sending information to legal assistant to prepare subpoenas for SWA and Local 556 witnesses to attend show cause hearing (1.3); revising motion and brief to compel SWA show cause hearing documents for which SWA asserts privilege (.3); communications with MLC re Carter appeals (.6); phone call with MDH and BGP re subpoenas, show cause hearing, and motion to compel (.9); preparing list of issues to discuss with SWA counsel PM prior to filing motion to compel (2.0); emailing PM and BM to schedule meeting (.1)	Gilliam	2.2	\$770.00	0.55	\$577.50
5/8/2023	Reviewing and revising notice of appeal (.6); <u>revising and updating subpoenas for SWA witnesses to attend show cause hearing (1.3)</u> ; <u>drafting emails to SWA and L556 counsel re accepting service and communications with MDH re same (2.0)</u> ; reviewing BGP communications re appeal (.1)	Gilliam	3.3	\$1,155.00	0.825	\$866.25

5/8/2023	Review and comment on proposed emails to P. McKeeby and union re appearing at hearing and subpoenas; review and comment on proposed subpoenas; conf. w/ M. Gilliam re witness issues for hearing; review and comment on proposed email to union re subpoenas; email M. Gilliam re witness attendance issue and subpoenas	Hill	1.1	\$434.50	0.275	\$325.88
5/9/2023	<u>Researching for motion and brief to compel witnesses to attend show cause hearing based on SWA refusal to coordinate service of subpoenas (.3); drafting motion to compel SWA witnesses to attend show cause hearing based on SWA refusal to coordinate service of subpoenas (2.0); revising motion to compel witnesses with local counsel edits (.4); drafting email to SWA counsel PM re coordinating service of subpoenas and communications with co counsel and SWA counsel PM re same (.7); communications with BGP and client re [redacted] (1.0)</u>	Gilliam	3.4	\$1,190.00	0.85	\$892.50
5/9/2023	Review and comment on emails re subpoena issues; teleconf w/M. Gilliam re status and strategy; review and revise draft motion re subpoenas; review Southwest response to Motion to Compel; teleconf w/M. Gilliam re the same	Pryor	1.6	\$792.00	0.4	\$594.00
5/9/2023	Review and comment on proposed email to P. McKeeby re witness issues; review motion to compel witnesses; email	Hill	0.5	\$197.50	0.125	\$148.13
5/10/2023	Revising, finalizing, and filing motion to compel SWA witnesses to attend show cause hearing, including preparing appendix, exhibits, and proposed order	Gilliam	3.5	\$1,225.00	0.875	\$918.75
5/10/2023	Emails re motion to compel attendance	Pryor	0.1	\$49.50	0.025	\$37.13
5/10/2023	Review and comment on motion regarding witness attendance and proposed order	Hill	1.2	\$474.00	0.3	\$355.50
5/16/2023	Revising and incorporating local counsel edits to Carter brief responding to SWA May 12 Brief re Sanctions (4.5); reviewing Court order re show cause hearing and religious liberty training (.5); communications with BGP re Court orders (.3); communicating with MDH re plans for serving subpoenas (.2); revising subpoenas for service (1.1); emailing TWU Local 556 counsel re subpoena issues (.1)	Gilliam	1.4	\$490.00	0.35	\$367.50

5/16/2023	Review file re identifying potential exhibits for show cause hearing; emails re the same; emails re witnesses for show cause hearings; review and comment on emails re subpoena issues; review Court's order re in camera documents; review Judge's order re witnesses; emails and confs re the same; confs w/D. Bruce re status and strategy	Pryor	3.5	\$1,732.50	0.875	\$1,299.38
5/16/2023	Review and comment on proposed email to P. McKeely and A. Ryan re subpoenas for show cause hearing; confs. w/ M. Gilliam re witness issues; email M. Gilliam re witness issues; review and comment on proposed email to union re witness issues; email M. Gilliam re process server timing; review and sign subpoenas; email M. Gilliam update re service of subpoenas; email M. Gilliam re service of B. Morris timing; email M. Gilliam re proposed email to union; conf. w/ B. Pryor and M. Gilliam re court's order re religious liberty training; email process server re cancellation of service	Hill	1.8	\$711.00	0.45	\$533.25
5/16/2023	Email process server re quote for subpoenas; conf. w/ M. Hill re same; revise subpoena re same; email M. Hill re same; assemble same; email process server re same	Garcia (Paralegal)	1.7	\$187.00	0.425	\$140.25
		<b>Total Hours / Fees</b>	<b>26.1</b>	<b>\$9,688.00</b>	<b>6.525</b>	<b>\$7,266.00</b>